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June 19, 2020

Via ECF and Email

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Petróleos de Venezuela, S.A., et al. v. MUFG Union Bank and Glas Americas LLC, 1:19-cv-10023

Dear Judge Failla:

Defendants and Counterclaim Plaintiffs in the above-captioned matter write to request leave to submit a Corrected Local Rule 56.1 Statement of Undisputed Material Facts in Support of Defendants and Counterclaim Plaintiffs' Motion for Summary Judgment, correcting certain citations and one typographical error in the version filed on June 10, 2020, as well as certain corrected excerpts of exhibits attached to the Declaration of Christopher J. Clark filed on June 10, 2020. These corrected excerpts contain additional pages unintentionally omitted from the documents filed on June 10, 2020. Plaintiffs and Counterclaim Defendants have consented to this request.

With the Court's leave, we are prepared to file a Corrected Local Rule 56.1 Statement, both under seal and on the public docket (in redacted form), and a Supplemental Declaration of Christopher J. Clark with the corrected excerpts of exhibits attached thereto. For the Court's reference and consideration, we attach full and changed-pages-only redline comparisons of the confidential Corrected Local Rule 56.1 Statement showing the changes to the version filed on June 10, 2020 in the courtesy copy of this letter sent by email pursuant to Your Honor's Individual Practice 2.B.

Respectfully,

/s/ Christopher J. Clark
Christopher J. Clark
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF and email)